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Steven Siegler, Partner
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Via ECF

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Fajardo, et al. v. WB Maintenance & Design Group Inc., et al.
Civil No. 1:21-cv-5236-PKC-SJB

Dear Judge Bulsara:

We represent Defendants W.B. Maintenance & Design Group Inc., W.B. & Son Construction Corp., Vladimir Briceno, Betty Briceno, Jeissy Briceno, and Jeimy Briceno in the above-referenced matter. We are writing to request an extension of the discovery period by thirty (30) days. The current discovery end date is July 14, 2022. Defendant Alexander Briceno has consented to this request. Plaintiff's counsel has not responded to my request, which was by letter dated July 7, 2022. This is my clients' first request for an extension. The current status of discovery is that the parties have exchanged documents and plaintiffs have provided interrogatory answers. No depositions have been conducted yet. We are requesting the extension because settlement negotiations failed and Jeimy Briceno and Jeissy Briceno (the owners/operators) have been focused on preparing the corporate defendants and their related entities to file for Chapter 11 bankruptcy. We expect the bankruptcy petition to be filed on July 15, 2022. Once the petition is filed, we will seek through the appropriate motion in the bankruptcy court to bring the individual defendants into the ambit of the automatic stay. The extension is necessary to permit us additional time to answer interrogatories and conduct depositions in the event that the district court matter proceeds against one or more of the parties. We would welcome a brief teleconference with the Court if appropriate.

Thank you for your time and attention to this matter.

Respectfully submitted,

By: /s/ Steven Siegler
Steven Siegler, Esq.